

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

0912139 B.C., LTD., a Canadian
corporation, and PAKAGE APPAREL,
INC., a Canadian corporation,

Plaintiffs,

v.

RAMPION USA INC., a Washington
corporation, and RAMPION
ENTERPRISES LTD., a Canadian
corporation,

Defendants.

No. 2:18-cv-01464-JLR

**STIPULATED MOTION TO EXTEND
DEADLINE TO RE-OPEN CASE
PENDING SETTLEMENT AND
~~PROPOSED~~ ORDER**



NOTE ON MOTION CALENDAR:

October 29, 2019

Pursuant to LCR 7(d)(1) and 10(g), Plaintiffs and Defendants, by and through their counsel of record, hereby stipulate and jointly move the Court for entry of an order extending the deadline to re-open the case pending the consummation of the formal settlement agreement.

On September 5, 2019, in response to a notice that the parties had reached a settlement in principle, the Court entered an Order (Dkt. # 67) striking all case deadlines and dismissing this case, subject to re-opening at the motion of any party by November 4, 2019, if the parties were unable to consummate their settlement agreement by that time. The parties now jointly move the Court to extend the November 4, 2019 deadline to re-open this case to November 13, 2019.

Good cause exists for the proposed extension. The parties signed a September 5, 2019 binding settlement term sheet prior to the provisional dismissal of this case. Since then, the

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1 parties have exchanged multiple drafts of formal settlement documents and have diligently
2 continued to negotiate the detailed terms. As of today, a small number of issues concerning the
3 terms and language of the formal settlement documents remain unresolved between the parties.
4 The parties' binding settlement term sheet was negotiated with the assistance of mediator Lou
5 Peterson and provides that in the event of any disagreement as to the meaning of the terms set
6 forth in the term sheet or in preparation of more formal documentation, the parties agree that Mr.
7 Peterson will resolve any such disagreement. As such, the parties are confident that they will
8 have a final, executed set of formal settlement documents before the additional requested time
9 expires.

10 Given the current status of negotiations, however, it appears the parties need a few extra
11 days beyond November 4, 2019 to finalize and execute the formal settlement documents. As a
12 result, the parties hereby request a short extension of the deadline to re-open this case from
13 November 4, 2019 to November 13, 2019.

14 DATED: October 29, 2019.

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ORDER

It is so ordered.

Dated this ^u30 day of October, 2019.



THE HONORABLE JAMES L. ROBART
United States District Judge

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